



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"
HOLLISTER BUILDING PO BOX 30473 LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us
RUSSELL J. HARDING, Director

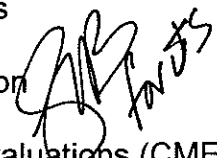
REPLY TO:

WASTE MANAGEMENT DIVISION
PO BOX 30241
LANSING MI 48909-7741

OPERATIONAL MEMO 111-4, Revision 4

April 9, 1999

TO: All Waste Management Division Supervisors

FROM: Jim Sygo, Chief, Waste Management Division 

SUBJECT: Comprehensive Groundwater Monitoring Evaluations (CME) and
Operation and Maintenance (O&M) inspections Inspections Notification
and Reporting Process

INTRODUCTION:

The Hazardous Waste Program Section (HWPS), Technical Support Unit (TSU) staff has the primary responsibility for conducting CME/O&M inspections. Because the District is the primary Department of Environmental Quality (DEQ) contact with regulated facilities, it is essential that the TSU staff closely coordinate their inspections with District compliance staff. Any inspection must be carefully arranged, scheduled, and performed with the District's knowledge. The District thus becomes aware of any specialized investigation or inspection to maintain good coordination of hazardous waste program issues with regulated facilities.

INSPECTION PROCESS:

Inspections will be scheduled by the TSU staff based upon the facility's routine sampling schedule and the Michigan Resource Conservation and Recovery Act (RCRA) grant work plan schedule. A list of the CME/O&M inspections to be conducted during the fiscal year is contained in the grant work plan. A copy of the United States Environmental Protection Agency (EPA) brochure on CME/O&M Inspections is provided as Attachment 1. The TSU staff will send a letter to the company (Attachment 2) notifying them that a CME/O&M has been scheduled. A copy of the notification letter will be sent to the District and to the EPA to advise them of the upcoming inspection. Upon receipt of the notification letter, the District staff and RCRA EPA Enforcement staff will research their files to determine whether the facility is bound by any enforcement action, (e.g., consent decree), that may affect the outcome of the CME/O&M inspection. The District staff and EPA Enforcement staff will be responsible for telephoning the TSU prior to the CME/O&M inspection to discuss their findings on this matter.

All lab scheduling, file reviews, checklists, field testing, and data analysis will be conducted by the TSU staff. The TSU staff will provide the District the option to

participate in field sampling and evaluation. The TSU staff are to keep the District informed on the status and progress of the CME/O&M inspection. When data is received from the laboratory, the TSU staff will telephone the District to notify them that the data has been received and to arrange a date to review the data and complete the inspection summary.

If a violation potentially qualifying the facility as a Significant Non-Complier (SNC) is suspected during the field inspection of a facility (even if lab analysis is not complete), the TSU staff will immediately arrange for a conference call with the District Supervisor and Enforcement Section to determine the facility's status and the action to be taken. Specific areas of responsibility will be determined during this conference call. The SNC determination must be made within one week of the field inspection. The definition of an SNC is provided in Attachment 3.

If the facility is determined not to be a SNC, then at the technical completion of the CME/O&M inspection (typical two to three month time frame due to preparations, scheduling, field activities, lab time, and data review), the TSU staff will prepare a draft letter. The draft letter will include a chronology of the site's groundwater monitoring program and summarize the facility's groundwater compliance status. A copy of the draft letter will be sent to the District for review and comment. The TSU staff will follow-up with a telephone call to the District to verify that the draft letter was received and to discuss any changes that the District would like to make. Based upon this discussion, the TSU staff will prepare a letter to the company to notify the facility of its compliance or noncompliance status. If the TSU staff prepares a letter of warning (LOW) notifying the company that it is in noncompliance, the letter must contain a paragraph which reads: "This letter of warning does not preclude or limit the DEQ's ability to initiate any other enforcement action, under state and federal law, as deemed appropriate." The letter, accompanied by a copy of the CME/O&M report, will be sent to the company with copies forwarded to the District. The original CME/O&M report will be filed in the HWPS's Monitoring Data file for the facility.

REPORTING:

Once the CME/O&M is completed, the TSU staff will report CME/O&M inspections on Compliance Monitoring and Enforcement Logs (CMEL) forms (Attachments 4a -4c). The TSU staff will complete monthly Resource, Conservation, and Recovery Information System (RCRIS) data entry and tracking.

If no violations are noted at the facility, the TSU staff will complete the CMEL form by filling in lines 1-10 (Attachment 4a). The date of the inspection will be entered as the "date" on line 6 and the summary report completion date along with an in compliance (IC) notation will be entered as the "Comment" on line 10. If violations are noted at the facility during the CME/O&M inspection, the TSU staff will leave line 10, "Comments," on the CMEL form blank and will complete lines 11-16 in the Violations Section and lines 19-22 in the Enforcement Section (Attachment 4b). The date entered on line 14 in the Violations Section ("Date Determined") will be the date the CME/O&M summary

report was issued. This date will be the same as the one entered on line 20 in the Enforcement Section as the date the facility was issued its enforcement notification.

If the facility subsequently corrects the violations noted during the CME/O&M inspection, the TSU staff will enter this information on a new CMEL form (Attachment 4c). The new CMEL will be an update to the CMEL that identified the CME/O&M violations at the facility. As such, a check will be entered in the "update" box on line 13 in the Violations Section. The sequence number on line 14 refers to the number that RCRIS assigns to the violation. This number can be obtained from the RCRIS printout for the facility. Staff will enter the date that the facility returned to compliance on line 17 in the Violations Section and enter that the facility has returned to compliance (RTC) as the comment on line 18.

FOLLOW-UP:

When the TSU staff receive a response from a facility regarding a CME/O&M, they will determine if the time frame specified in the original cover letter was met. The TSU staff will contact the District staff to inform them that the facility has responded to the notification letter. All communications with the company by the TSU staff and/or the District should be thoroughly documented using either a staff report or interoffice memo. The TSU staff will review technical submittals within 30 days from receipt of the company's response to remain in compliance with grant time frames. If technical field issues need to be addressed, the TSU staff will inform the District of a follow-up inspection and then conduct it as soon as possible.

Following the technical review and/or follow-up inspection, the TSU staff will contact the District to discuss their findings, to indicate whether there are any items that need to be verified during the District's next CEI inspection, and to discuss whether or not the TSU staff are needed during the CEI inspection to conduct the groundwater monitoring portion. If the facility continues to be in violation, the TSU staff will contact the District and discuss the situation. Based upon this discussion, the TSU staff may need to contact the Enforcement Section to determine how to proceed. If the technical review shows that the facility has corrected the violations, the TSU staff will send the facility a letter acknowledging the return to compliance. The TSU staff will be responsible for providing the District with copies of all responses to the facility.

SUMMARY:

This operating procedure identifies staff responsibilities for conducting CME/O&M inspections. It should be emphasized that these types of inspections require close coordination between the TSU and District staff so as to officially notify the facility of its groundwater monitoring compliance status and to properly notify the EPA of progress made to fulfill grant commitments.

Attachments

What is EPA's inspection authority?

Section §3007 of RCRA Subtitle C gives EPA the authority to conduct compliance and evaluation inspections of hazardous waste facilities for the purpose of developing regulations, preparing permits, or ensuring compliance with RCRA regulations. Access to these facilities is granted to "duly designated" officers, representatives, or employees of authorized State hazardous waste programs. Section §3007 allows authorized officials to:

- Have access to, and copy all records at hazardous waste management facilities at all reasonable times.
- Obtain samples of any waste containers or labeling for such waste, including spills.
- Determine compliance with RCRA.

FYI

- **Aquifer** - A geologic formation, group of formations, or part of a formation capable of yielding a significant amount of ground water to wells or springs.
- **Ground Water** - Water below the land surface in a zone of saturation.
- **Landfill** - A disposal facility or part of a facility where hazardous waste is placed in or on land and that is not classified as a land treatment facility, surface impoundment, or an injection well.
- **Land Treatment** - A facility or part of a facility at which hazardous waste is applied onto or incorporated into the soil surface. Such facilities are disposal facilities if the waste remains after closure.

EPA and the States seek a positive working relationship with the RCRA regulated community to ensure the best protection of the environment and human health. Please call any of the following telephone numbers to receive information concerning Federal and/or State solid and hazardous waste policies and regulations:

**EPA REGIONAL OFFICE
TELEPHONE NUMBER**

**STATE OFFICE
TELEPHONE NUMBER**

**(703) 920-9810 or 800-424-9346
RCRA/CERCLA HOTLINE**

**(202) 260-9327
RCRA DOCKET**



Printed on Recycled Paper

ATTACHMENT #1

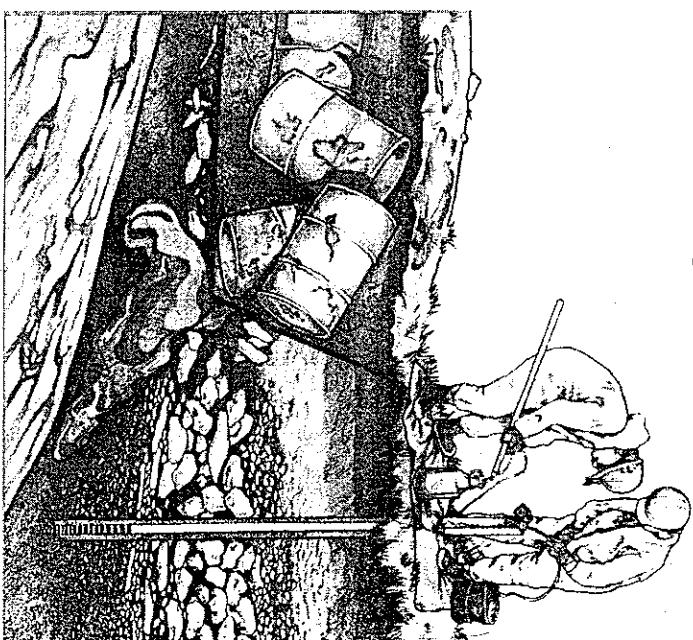
United States EPA 9850.3FS
Environmental Protection Agency October 1991

Solid Waste and Emergency Response



RCRA

**Comprehensive
Ground Water
Monitoring
Evaluations (CME)
and
Operation &
Maintenance (O&M)
Inspections**



The Comprehensive Ground Water Monitoring Evaluation (CME) and Operation and Maintenance (O&M) inspection evaluates the adequacy of ground water monitoring systems at Resource Conservation and Recovery Act (RCRA) land disposal facilities (e.g., surface impoundments, landfills, land treatment units, etc.).

What is a CME inspection ?

The objective of a CME is to determine whether a facility has a ground water monitoring system which is adequately designed and operated to detect releases and to define the rate and extent of contaminant migration from a RCRA regulated unit.

The CME includes:

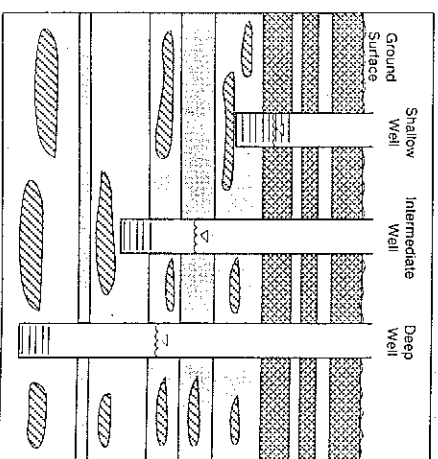
- Evaluation of the site geological characterization.
- Evaluation of the site hydrological characterization and description of the uppermost aquifer.
- Evaluation of the criteria used for well placement and for screen lengths of ground water monitoring wells.
- Evaluation of the criteria for drilling method, monitoring well design, and construction.
- Evaluation of the ground water assessment plan or outline.
- Evaluation of the sampling and analysis plan and its implementation.
- Field verification of ground water levels, and of the number and location of ground water monitoring wells and piezometers.
- Collection of samples for analysis to help verify the analytical precision and methodology of a facility's procedures.
- Possible use of confirmatory geophysical methods to verify facility assessment of hydrogeology or contaminant distribution.
- Possible evaluations of other ground water activities at RCRA facilities (e.g., corrective action activities).

What is an O&M inspection ?

The O&M inspection focuses on how ground water monitoring systems are operated and maintained. The O&M inspection is designed to :

- Determine that the facility's personnel are collecting ground water samples in accordance with the Sampling and Analysis Plan.
- Determine that the facility's sampling devices are in working order and that the facility is abiding by maintenance provisions.
- Determine that individual monitoring wells and piezometer/observation wells within a ground water monitoring system continue to yield representative ground water samples and reliable hydrologic data.
- Identify violations in regard to operation and maintenance programs and/or detect a need for a more thorough scrutiny of the facility's ground water monitoring program.
- Identify issues or concerns that enforcement staff should assess in a future comprehensive ground water monitoring evaluation.
- Collect ground water evaluation data.

TYPICAL ARRANGEMENT OF CLUSTERED, VERTICALLY SEPARATED WELLS



In addition, if the facility has been notified of deficiencies in the ground water monitoring system, the O&M inspection will determine whether these deficiencies have been corrected.

What is the relation between the O&M and CME ?

Once the CME inspection has determined that a facility has an adequately designed and properly operated ground water monitoring system in place, subsequent O&M inspections determine how well the owner/operator maintains the ground water monitoring system's efficiency and operations.

The field inspection portion of both inspections may be the same; however, during the O&M inspection any activities or system changes that have been completed since the last CME are evaluated. An O&M inspection report can recommend that a CME be performed if the ground water flow regime has changed.

Split samples may be collected for either type of inspection.

What can be expected from EPA/State after a CME or an O&M inspection has been completed ?

EPA/State will make a determination, based on the inspection results, to pursue one of the following actions:

- No further action.
- A warning letter (Notice of Violation or Notice of Deficiency).
- An administrative order or civil action requiring compliance and payment of a penalty.
- A permit denial or modification.
- A criminal investigation or action.

ATTACHMENT #2

NOTIFICATION LETTER—COMPREHENSIVE MONITORING EVALUATION

NOTIFICATION LETTER—OPERATION AND MAINTENANCE INSPECTION



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY*"Better Service for a Better Environment"*

HOLLISTER BUILDING PO BOX 30473 LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

WASTE MANAGEMENT DIVISION
PO BOX 30241
LANSING MI 48909-7741

March 2, 1999

Dear _____:

SUBJECT: Comprehensive Groundwater Monitoring Evaluation
MI? ??? ??? ???

The Michigan Department of Environmental Quality (Department) will be visiting _____ on _____ to conduct a Comprehensive Groundwater Monitoring Evaluation (CME). The Department will be conducting a compliance status review and preliminary technical evaluation of your groundwater monitoring system(s). The basis for the Department's review can be found in Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended

Prior to visiting the site, staff will be reviewing your Sampling and Analysis Plan (SAP) so that they can determine in the field whether your on-site sampling methods comply with the groundwater sampling and handling procedures specified in your SAP and/or permit. During our site inspection, staff plan to conduct the following: (1) measure static water levels from your groundwater monitor wells to verify groundwater flow direction; (2) split samples from selected wells while you conduct your regularly scheduled sampling; and (3) evaluate the physical integrity of your groundwater monitoring wells and sampling equipment. Staff will be reviewing and evaluating all your data records, including recent and previous hydrogeologic information, to determine the adequacy of your facility's groundwater monitoring system.

If you have any questions regarding the upcoming CME inspection, please e-mail me at _____@state.mi.us or contact me at the number below.

Sincerely,

Hazardous Waste Program Section
Waste Management Division
517-_____cc: (district supervisor) _____
Ms. De Montgomery, DEQ/EPA Reporting_____
HWP/C&E File



JOHN ENGLER Governor

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RUSSELL J. HARDING, Director

REPLY TO:

WASTE MANAGEMENT DIVISION
PO BOX 30241
LANSING MI 48909-7741

{date}

Dear _____:

SUBJECT: O&M Inspection
{facility name.....} MI? ??? ??? ???

The Michigan Department of Environmental Quality (Department) will be visiting _____ on _____ to conduct an Operation and Maintenance Inspection (O&M) of your groundwater monitoring system(s). The O&M is an inspection which the Department conducts to follow up on the Comprehensive Groundwater Monitoring Evaluation (CME) previously performed at your facility. Whereas the CME inspection was performed to evaluate the technical adequacy of your groundwater monitoring system(s), the O&M inspection is designed to evaluate the performance, operation, and maintenance of this (these) system(s). The basis for the Department's review can be found in Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended

Prior to visiting the site, staff will be reviewing your Sampling and Analysis Plan (SAP) so that they can determine in the field whether your on-site sampling methods comply with the groundwater sampling and handling procedures specified in your SAP. During our site inspection, staff plan to conduct the following: (1) measure static water levels from your groundwater monitor wells to verify groundwater flow direction; (2) split samples from selected wells while you conduct your regularly scheduled sampling; and (3) evaluate the physical integrity of your groundwater monitoring wells and sampling equipment. Staff will be reviewing and evaluating all your data records, including recent and previous hydrogeologic information, to determine the continued viability of your facility's groundwater monitoring system.

If you have any questions regarding the upcoming O&M inspection, please e-mail me at ????@state.mi.us or contact me at the number below.

Sincerely,

Waste Management Division
517-____-____

cc: (district supervisor) _____
Ms. De Montgomery, DEQ/EPA Reporting
HWP/C&E File

SIGNIFICANT NON-COMPILERS (SNCs)—EPA DEFINITION ⁽¹⁾:

Significant non-compilers (SNC's) are those facilities which have caused actual exposure or a substantial likelihood of exposure to hazardous waste or hazardous waste constituents; are chronic or recalcitrant violators; or deviate substantially from the terms of a permit, order, agreement or from RCRA statutory or regulatory requirements. The actual or substantial likelihood of exposure should be evaluated using facility specific environmental and exposure information whenever possible. This may include evaluating potential exposure pathways and the mobility and toxicity of the hazardous waste being managed. However, it should be noted that environmental impact alone is sufficient to cause a facility to be a SNC, particularly when the environmental media affected require special protection (e.g., wetlands or sources of underground drinking water). Facilities should be evaluated on a multi-media basis; however, a facility may be found to be a chronic or recalcitrant violator based solely on prior RCRA violations and behavior.

⁽¹⁾ From EPA's 1996 Enforcement Response Procedures



RCRIS COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. Completed by: MI HG /Preparer's Initials

HANDLER

2. EPA ID #: MID 012 345 678

3. HANDLER NAME: Waste Incorporated

4. ADDRESS: Water Street Anytown, Mi.
STREET CITY STATE**EVALUATION** 5. ADD X UPDATE ECN # DELETE 6. DATE 03-02-1999 7. AGENCY S S-STATE B-STATE CONTRACTOR
(Date of Inspection) E-EPA X-OVERSIGHT C-EPA CONTR

8. TYPE OF EVALUATION (circle one code)

CEI Compliance Evaluation Inspection
SPL Sampling Inspection
FRR Financial Record Review
NRR Non-financial Record Review (Specify document reviewed: _____)CME Compliance Monitoring Evaluation
OAM Operation and Maintenance
CSE Compliance Schedule Evaluation
CDI Case Development Inspection
CAO Corrective Action Inspection
OTH Other Inspection (MUST CIRCLE A REASON FOR EVALUATION)

9. REASON FOR EVALUATION

01 Follow-up 08 Waste Oil 22 S.E. Initiative
04 Citizen Complnt 13 Multimedia Inspect. 41 Data Analysis
05 Withdrawal 15 Focused Inspection 78 Review Permits
06 Closure 18 Compliance Assistance 79 Hydraulic Monitor
07 Construction 21 Sag. Bay Initiative Cap Inspection10. COMMENT IC (Letter sent to the company on 4/2/99)

11. COVERAGE AREAS (circle codes for all areas evaluated):

GENERATOR
GER ALL REQUIREMENTS
GLB LAND BAN
GMR MANIFEST
GOR OTHER
GSQ SMALL QUAN GENTRANSPORTER
TRR ALL REQUIREMENTS
TOR OTHEROTHER REQUIREMENTS
CAS CORRECTIVE ACTION SCHEDULE
CSS COMPLIANCE SCHEDULE VIOLATION

TREATMENT, STORAGE OR DISPOSAL

DMR MANIFEST
DOR OTHER
DCL CLOSURE/POST-CLOSURE
DLB LAND BAN
DFR FINANCIALDGW GROUND WATER
DIN INCINERATOR
DPB PERMIT APPLICATION
DGS GENERAL (CONSTRUCTION)
DBF BIF
DTC TOXICITY CHARACTERISTICS
DAE AIR EMISSIONS
DCA SWMU CA Subpart S §264

VIOLATIONS 12. AGENCY _____ 13. ADD _____ UPDATE _____ DELETE _____

14. SEQ # _____ COVERAGE AREA _____ CLASS (1,2,P) HPV _____
 SEQ # _____ COVERAGE AREA _____ CLASS (1,2,P) HPV _____
 SEQ # _____ COVERAGE AREA _____ CLASS (1,2,P) HPV _____
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 SEQ # _____ COVERAGE AREA _____ CLASS (1,2,P) HPV _____

15. DATE DETERMINED ____-____-____ 16. SCHEDULED RESPONSE ____-____-____

17. DATE RESOLVED ____-____-____

18. COMMENT _____

ENFORCEMENT 19. ADD _____ UPDATE _____ ECN # _____ DELETE _____

20. DATE ISSUED ____-____-____ 21. AGENCY _____

22. ENFORCEMENT TYPE (circle the appropriate 3 digit code)

120 WRITTEN INFORMAL (LOW)
 086 DRAFT STIPULATION AGREEMENT
 315 STIPULATED PENALTY CALL-IN
 710 CRIMINAL ACTION
 510 CIVIL ACTION
 410 REFERRAL TO AG
 810 STATE REFERRAL TO EPA
 115 INFO. REQUEST LETTER
 610 CONSENT DECREE (ADM. ORDER)
 620 JUDICIAL ORDER
 345 STATE CORRECTIVE ACTION ORDER
 089 CRIMINAL TRIAL
 ### SIGNIFICANT NON COMPLIANCE (SNC)

EPA USE ONLY
 210 INITIAL 3008A ORDER
 220 INITIAL 7003 ORDER
 230 INITIAL 3013 ORDER
 240 INITIAL 3008H ORDER
 250 INITIAL NON (FED FAC)
 310 FINAL 7008A ORDER
 320 FINAL 7003 ORDER
 330 FINAL 3013 ORDER
 340 FINAL 3008H ORDER
 350 FINAL FED FAC COMP AGRMT
 360 CERCLA 106 ORDER
 370 CERCLA 104 ORDER
 420 REFERRAL TO DOJ
 820 EPA REFERRAL TO STATE
 830 REFERRAL TO CERCLA
 850 FED FAC REF TO HQ

PENALTY ASSESSED \$ _____

PENALTY SETTLED \$ _____

23. POLLUTION PREVENTION INDICATORS
 EAE Environmental Auditing
 EPE Environmental Public Awareness
 ERE Environmental Restoration
 PPE Pollution Prevention
 PRE Pollution Reduction

24. COMMENT _____



RCRIS COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. Completed by: MI HG / Preparer's Initials**HANDLER**2. EPA ID #: MID 012 345 6783. HANDLER NAME: Waste Incorporated4. ADDRESS: Water Street Anytown, Mi.
STREET CITY STATE**EVALUATION** 5. ADD X UPDATE ECN # DELETE 6. DATE 03-02-1999 7. AGENCY S S-STATE B-STATE CONTRACTOR
(Date of Inspection) E-EPA X-OVERSIGHT C-EPA CONTR

8. TYPE OF EVALUATION (circle one code)

CEI Compliance Evaluation Inspection
SPL Sampling Inspection
FRR Financial Record Review
NRR Non-financial Record Review (Specify document reviewed: _____)CME Compliance Monitoring Evaluation
OAM Operation and Maintenance
CSE Compliance Schedule Evaluation
CDI Case Development Inspection
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10. COMMENT _____

11. COVERAGE AREAS (circle codes for all areas evaluated):

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GER ALL REQUIREMENTS
GLB LAND BAN
GMR MANIFEST
GOR OTHER
GSQ SMALL QUAN GENTRANSPORTER
TRR ALL REQUIREMENTS
TOR OTHEROTHER REQUIREMENTS
CAS CORRECTIVE ACTION SCHEDULE
CSS COMPLIANCE SCHEDULE VIOLATION

TREATMENT, STORAGE OR DISPOSAL

DMR MANIFEST
DOR OTHER
DCL CLOSURE/POST-CLOSURE
DLB LAND BAN
DFR FINANCIAL
DGW GROUND WATER
DIN INCINERATOR
DPB PERMIT APPLICATION
DGS GENERAL (CONSTRUCTION)
DBF BIF
DTC TOXICITY CHARACTERISTICS
DAE AIR EMISSIONS
DCA SWMU CA Subpart S §264

[illegible]

15. DATE DETERMINED 04-02-1999 16. SCHEDULED RESPONSE 05-15-1999
(Date Summary Letter sent to the Facility)
17. DATE RESOLVED _ _ - _ - _ -
18. COMMENT

ENFORCEMENT	19.	ADD	X	UPDATE	ECN #	DELETE
-------------	-----	-----	---	--------	-------	--------

20. DATE ISSUED 04-02-1999 21. AGENCY S

22. ENFORCEMENT TYPE (circle the appropriate 3 digit code)

```

120 WRITTEN INFORMAL (LOW)
086 DRAFT STIPULATION AGREEMENT
315 STIPULATED PENALTY CALL-IN
710 CRIMINAL ACTION
510 CIVIL ACTION
410 REFERRAL TO AG
810 STATE REFERRAL TO EPA
115 INFO. REQUEST LETTER
610 CONSENT DECREE (ADM. ORDER)
620 JUDICIAL ORDER
345 STATE CORRECTIVE ACTION ORDER
089 CRIMINAL TRIAL
### SIGNIFICANT NON COMPLIANCE (SNC)

```

EPA USE ONLY

```

210  INITIAL 3008A ORDER
220  INITIAL 7003 ORDER
230  INITIAL 3013 ORDER
240  INITIAL 3008H ORDER
250  INITIAL NON (FED FAC)
310  FINAL 7008A ORDER
320  FINAL 7003 ORDER
330  FINAL 3013 ORDER
340  FINAL 3008H ORDER
350  FINAL FED FAC COMP AGRMT
360  CERCLA 106 ORDER
370  CERCLA 104 ORDER
420  REFERRAL TO DOJ
820  EPA REFERRAL TO STATE
830  REFERRAL TO CERCLA
850  FED FAC REF TO HQ

```

PENALTY ASSESSED \$

PENALTY SETTLED \$

23. POLLUTION PREVENTION INDICATORS
EAE Environmental Auditing
EPE Environmental Public Awareness
ERE Environmental Restoration
PPE Pollution Prevention
PRE Pollution Reduction

24. COMMENT



RCRIS COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. Completed by: MI HG /Preparer's Initials

HANDLER

2. EPA ID #: MID 012 345 678

3. HANDLER NAME: Waste Incorporated

4. ADDRESS: Water Street Anytown, Mi.
STREET CITY STATE

EVALUATION 5. ADD ___ UPDATE ___ ECN # ___ DELETE ___

6. DATE ___-___-___ 7. AGENCY ___ S-STATE B-STATE CONTRACTOR
E-EPA X-OVERSIGHT C-EPA CONTR

8. TYPE OF EVALUATION (circle one code)

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SPL Sampling Inspection
FRR Financial Record Review
NRR Non-financial Record Review (Specify document reviewed: _____)

CME Compliance Monitoring Evaluation
OAM Operation and Maintenance
CSE Compliance Schedule Evaluation
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04 Citizen Complnt	13 Multimedia Inspect.	41 Data Analysis
05 Withdrawal	15 Focused Inspection	78 Review Permits
06 Closure	18 Compliance Assistance	79 Hydraulic Monitor
07 Construction	21 Sag. Bay Initiative	Cap Inspection

10. COMMENT _____

11. COVERAGE AREAS (circle codes for all areas evaluated):

GENERATOR		TREATMENT, STORAGE OR DISPOSAL	
GER	ALL REQUIREMENTS	DMR	MANIFEST
GLB	LAND BAN	DOR	OTHER
GMR	MANIFEST	DCL	CLOSURE/POST-CLOSURE
GOR	OTHER	DLB	LAND BAN
GSQ	SMALL QUAN GEN	DFR	FINANCIAL
TRANSPORTER		DGW	GROUND WATER
TRR	ALL REQUIREMENTS	DIN	INCINERATOR
TOR	OTHER	DPB	PERMIT APPLICATION
OTHER REQUIREMENTS		DGS	GENERAL (CONSTRUCTION)
CAS	CORRECTIVE ACTION SCHEDULE	DBF	BIF
CSS	COMPLIANCE SCHEDULE VIOLATION	DTC	TOXICITY CHARACTERISTICS
		DAE	AIR EMISSIONS
		DCA	SWMU CA Subpart S \$264

VIOLATIONS 12. AGENCY S 13. ADD UPDATE X DELETE

[illegible]

15. DATE DETERMINED - - 16. SCHEDULED RESPONSE - -

17. DATE RESOLVED 06-01-1999

18. COMMENT RTC

ENFORCEMENT	19.. ADD	UPDATE	ECN #	DELETE
-------------	----------	--------	-------	--------

20. DATE ISSUED - - 21. AGENCY

22. ENFORCEMENT TYPE (circle the appropriate 3 digit code)

```

120 WRITTEN INFORMAL (LOW)
086 DRAFT STIPULATION AGREEMENT
315 STIPULATED PENALTY CALL-IN
710 CRIMINAL ACTION
510 CIVIL ACTION
410 REFERRAL TO AG
810 STATE REFERRAL TO EPA
115 INFO. REQUEST LETTER
610 CONSENT DECREE (ADM. ORDER)
620 JUDICIAL ORDER
345 STATE CORRECTIVE ACTION ORDER
089 CRIMINAL TRIAL
### SIGNIFICANT NON COMPLIANCE (SNC)

```

EPA USE ONLY

```

210  INITIAL 3008A ORDER
220  INITIAL 7003 ORDER
230  INITIAL 3013 ORDER
240  INITIAL 3008H ORDER
250  INITIAL NON (FED FAC)
310  FINAL 7008A ORDER
320  FINAL 7003 ORDER
330  FINAL 3013 ORDER
340  FINAL 3008H ORDER
350  FINAL FED FAC COMP AGRMT
360  CERCLA 106 ORDER
370  CERCLA 104 ORDER
420  REFERRAL TO DOJ
820  EPA REFERRAL TO STATE
830  REFERRAL TO CERCLA
850  FED FAC REF TO HQ

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PENALTY ASSESSED \$

PENALTY SETTLED \$

23. POLLUTION PREVENTION INDICATORS
EAE Environmental Auditing
EPE Environmental Public Awareness
ERE Environmental Restoration
PPE Pollution Prevention
PRE Pollution Reduction

24. COMMENT